



THE CITY OF NEW YORK
LAW DEPARTMENT

ZACHARY W. CARTER
Corporation Counsel

100 CHURCH STREET
NEW YORK, NY 10007

ERICA M. HABER
phone: (212) 356-3545
fax: (212) 356-3509
email: ehaber@law.nyc.gov

September 30, 2014

VIA ECF

Honorable Vera M. Scanlon
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Carl Goodloe v. The City of New York, et al.
12 CV 3018 (KAM) (VMS)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department and am assigned to represent defendants City of New York, Detective Christopher Cooke, Detective Vincent Dauge, Sergeant Claudio Ramirez, Police Officer Frank Chiodi, and Undercover Police Officer #2570 in the above-referenced matter. I write, with the consent of plaintiff's counsel, Harold Baker, Esq., to respectfully request an extension of time from September 30, 2014 to and including October 21, 2014, within which non-party Detective Mechelle King may respond to plaintiff's Questions in Lieu of Deposition to Detective King.

By way of background, plaintiff alleges, *inter alia*, that he was maliciously prosecuted in connection with an arrest that occurred on April 25, 2007, in the vicinity of the Cypress Hills Houses in Brooklyn. The reason for this request is that, despite diligent efforts, the undersigned has not had an opportunity to meet with non-party Detective King in order to prepare her responses to plaintiff's Questions in Lieu of Deposition. Upon information and belief, Detective King has been temporarily assigned to a special Task Force since at least the date that plaintiff served his Questions in Lieu of Deposition. In addition, upon information and belief, Detective King is currently on vacation until October 3, 2014, and is expected to return to her permanent Command on that date. The requested extension will allow the undersigned the opportunity to meet with Detective King and prepare her responses to plaintiff's questions.

Based on the foregoing, Defendants respectfully request an extension of time from September 30, 2014 to and including October 21, 2014, within which Detective King may respond to plaintiff's Questions in Lieu of Deposition.

Thank you for your consideration herein.

Respectfully submitted,

/s/

Erica M. Haber
Senior Counsel
Special Federal Litigation Division

cc: Harold Baker, Esq.
Attorney for plaintiff
(via ECF)